PROPOSAL 52

5 AAC 24.366. Solomon Gulch Salmon Hatchery Management Plan.

Amend the *Solomon Gulch Salmon Hatchery Management Plan* to reduce straying of hatchery-produced salmon, as follows:

- 5 AAC 24.366 Solomon Gulch Salmon Hatchery Management Plan
- (a) Fish stocks in the state shall be managed consistent with sustained yield of wild fish stocks. [1] The department, in consultation with the hatchery operator, shall manage the Valdez Narrows Subdistrict to achieve the corporation's pink salmon escapement goal for the Solomon Gulch salmon hatchery. The department may manage those waters of Valdez Arm south to the latitude of Rocky Point to assist in the achievement of the corporation's pink salmon escapement goal for the hatchery. Management to achieve an adequate return of fish to enhancement projects for brood stock shall be consistent with sustained yield of wild fish stocks. [2]

. . .

- (e) <u>Solomon Gulch Salmon Hatchery has legislative responsibility to incorporate the following PNP Hatchery Act mandated obligations:</u>
 - (1) fish stocks in the state shall be managed consistent with sustained yield of wild fish stocks[3]
 - (2) hatchery programs shall be operated without adversely affecting natural stocks of fish in the state [4]
 - (3) hatchery programs shall be operated under a policy of management which allows reasonable segregation of returning hatchery-reared salmon from naturally occurring stocks; [5]
 - (4) Hatchery program remote release sites shall be located in an area where a reasonable segregation from natural stocks occurs [6]
 - (5) hatchery operations and specifications must be consistent with the comprehensive regional salmon plan approved under AS 16.10.375[7]
 - (6) the department and board shall define and validate straying proportions "based on the best available scientific information" to sustain productivity, without adversely affecting, or jeopardizing sustained yield of wild naturally occurring salmon[8] [9]
 - (7) validated proportions of benign hatchery salmon straying are defined as chinook xxx%; sockeye xxx%; coho xxx%; chum xxx%, pink xxx%;
 - (8) Until the department and board have a policy of management that justifies and validates this reasonable segregation, of straying proportions without jeopardizing wild stock sustained yield,[1] the CSP and genetics policy 2% rule will be adhered to within wild naturally occurring streams[10]
 - (9) when proportions of hatchery salmon straying exceed validated percentages, jeopardizing sustained yield of wild fish stock, production shall be ramped down the following spring, from each Remote Release Site, hatchery or THA source incrementally until adverse affects cease[11],[12]
- [1] AS 16.05.730 (a) Management of Wild and enhanced Stocks of Fish
- [2] AS 16.05.730 (b) Management of Wild and enhanced Stocks of Fish
- [3] AS 16.05.730 Management of Wild and Enhanced Stocks of Fish.

- [4] PNP Hatchery Act legislative intent
- [5] PNP Hatchery Act legislative intent
- [6] AS 16.10.420. (10) Conditions of a Hatchery Permit
- [7] AS 16.10.480 (f) Contracts for the Operation of State Hatcheries
- [8] 5AAC 39.222 Policy For The Management Of Sustainable Salmon Fisheries (c)(1) (B),(D), (2)(D); (3)(B),(F)
- [9] PNP Hatchery Act legislative intent
- [10] 5AAC 39.222 Policy For The Management Of Sustainable Salmon Fisheries (c)(1) (B),(D); (2)(D); (3)(B)(F)
- [11] Intent of PNP Hatchery Act
- [12] Article VIII Section 3 and 4. Natural Resources, Common Use; Sustained Yield. Alaska Constitution

What is the issue you would like the board to address and why? Straying is jeopardizing production and sustained yield of wild fish populations.

AS 16.10 375 Regional Salmon Plans was the beginning "to designate regions of the state for the purpose of salmon production". Salmon Production to aid our at that time failing runs.

The AHRP results presented by ADFG at the Hatchery Committee meeting, showed that hatchery fish Relative Reproductive Success (RRS), averaged 0.42, less than half, of natural wild stocks reproductive production a value of 1.0 in wild streams.

The Solomon Gulch SGH Salmon Hatchery is one of the prime offenders making up a majority of the facilities creating unacceptable inter-regional hatchery straying from PWS into LCI wild significant stocks. Of the hatchery facilities in PWS, SGH made up only 3% in 2014; but 40% of the facilities were SGH in 2015; and 30% in 2016.

This is unacceptable to the public trust and the laws to protect wild fish in the state of Alaska. This is not reasonable segregation and is against the law.

This pattern necessitates that production at this hatchery be ramped down by at least 10%-20% increments each year, until this straying ceases. While it is understood that straying varies year to year and system by system it is time to create a framework of phased reduction, to address the variables and recognize and admit the damage we are exerting as wild populations are getting homogenized into lower productivity. Lower Productivity, the opposite of the very reason for designating regions to rehabilitate our ailing fisheries to raise salmon productivity not lower it.